



U.S. Department
of Transportation
**Federal Aviation
Administration**

Aviation Safety

800 Independence Ave
Washington, DC 20591

December 16, 2021

Exemption No. 18975
Regulatory Docket No. FAA-2017-0050

Mr. John Goglia
President
Aerospace Maintenance Council
Post Office Box 824
Jenks, OK 74037

Dear Mr. Goglia:

This letter is to inform you that the Federal Aviation Administration (FAA) has granted your request for exemption. This letter transmits the FAA's decision, explains the FAA's basis, and provides the conditions and limitations of the exemption, including the date it ends.

The Basis for the FAA's Decision

By letter dated October 19, 2021, you petitioned the FAA on behalf of Aerospace Maintenance Competition (AMC) for an exemption from § 147.21 of Title 14, Code of Federal Regulations (14 CFR) to the extent necessary to allow Aviation Maintenance Technician School (AMTS) students to seek credit for time spent preparing for and competing in the Aerospace Maintenance Competition (AMC).

Although you requested an extension of Exemption No. 17262A (copy enclosed) that exemption expired on March 31, 2021. Therefore, the FAA is issuing Aerospace Maintenance Competition a new exemption.

The FAA has issued grants of exemption in circumstances similar in all material respects to those presented in your petition. In Grant of Exemption Nos. 5297 and 17262 (copies enclosed), the FAA found that a grant of exemption would increase public awareness of the knowledge, skills, and abilities required of the certificated aviation maintenance technician.

The FAA noted that it endorses any activity that publicizes the professionalism and competence of those persons responsible for aviation safety. The FAA determined that allowing authorized faculty members of the individual schools to determine if the time students devoted to the U.S. Skill Olympics is creditable toward satisfying the requirements of § 147.21 is an acceptable method of ensuring the intent of this section is complied with.

AFS-22-00264-E

Having reviewed your reasons for requesting an exemption, I find that:

- They are similar in all material respects to relief previously requested in the enclosed Grant of Exemption Nos. 5297 and 17262;
- The reasons stated by the FAA for granting the enclosed Grant of Exemption Nos. 5297 and 17262 also apply to the situation you present; and
- A grant of exemption is in the public interest.

The FAA's Decision

The FAA has determined that good cause exists for not publishing a summary of the petition in the *Federal Register*. The FAA has determined that good cause exists because the requested exemption would not set a precedent and any delay in acting on this petition would be detrimental to AMC.

Under the authority contained in 49 U.S.C. §§ 106(f), 40113, 44701, and 44807, which the FAA Administrator has delegated to me, I hereby grant Aviation Maintenance Competition an exemption from 14 CFR § 147.21 to the extent necessary to allow Aviation Maintenance Technician School (AMTS) students to seek credit for time spent preparing for and competing in the Aerospace Maintenance Competition, subject to the following conditions and limitations.

Conditions and Limitations

1. This exemption is valid only for substitution of the curriculum requirements of § 147.21 for the purpose of student participation in the Aerospace Maintenance Competition.
2. Only authorized faculty members of schools whose students participate in the Aerospace Maintenance Competition may determine if student time dedicated to preparing for and participating in the Aerospace Maintenance Competition may be considered creditable to satisfy the requirements of § 147.21.
3. Creditable time is limited to maximum of 60 hours per student per year.

Failure to comply with any of the above conditions and limitations may result in the immediate suspension or rescission of this exemption.

The Effect of the FAA's Decision

This exemption terminates on January 31, 2024, unless sooner superseded or rescinded.

To request an extension or amendment to this exemption, please submit your request by using the Regulatory Docket No. FAA-2017-0050 (<http://www.regulations.gov>). In addition, you should submit your request for extension or amendment no later than 120 days prior to the expiration listed above, or the date you need the amendment, respectively.

Any extension or amendment request must meet the requirements of 14 CFR § 11.81.

Sincerely,

/s/

Robert C. Carty

Acting Executive Director, Flight Standards Service

Enclosures



U.S. Department
of Transportation
**Federal Aviation
Administration**

Aviation Safety

800 Independence Ave
Washington, DC 20591

March 20, 2019

Exemption No. 17262A
Regulatory Docket No. FAA-2017-0050

Mr. John Goglia
President
Aerospace Maintenance Council
Post Office Box 824
Jenks, OK 74037

Dear Mr. Goglia:

This letter is to inform you that we have granted your petition to extend Exemption No. 17262. It transmits our decision, explains its basis, and gives you the conditions and limitations of the exemption, including the date it ends.

The Basis for Our Decision

By letter dated February 28, 2019, you petitioned the Federal Aviation Administration (FAA) on behalf of Aerospace Maintenance Council for an extension of Exemption No. 17262. That exemption from § 147.21 of Title 14, Code of Federal Regulations (14 CFR) allows Aviation Maintenance Technician School (AMTS) students to seek credit for time spent preparing for and competing in the Aerospace Maintenance Competition (AMC).

In your petition, you indicate that there has been no change in the conditions and reasons relative to public interest and safety that were the basis for granting the original exemption.

Our Decision

The FAA has determined that good cause exists for not publishing a summary of the petition in the Federal Register because the requested extension of the exemption would not set a precedent, and any delay in acting on this petition would be detrimental to Aerospace Maintenance Competition.

The FAA has determined that the justification for the issuance of Exemption No. 17262 remains valid with respect to this exemption and is in the public interest. Therefore, under the authority provided by 49 U.S.C. §§ 106(f), 40113, and 44701, which the FAA Administrator has delegated to me, I grant your petition, subject to the following conditions and limitations.

AFS-19-125609-E

Conditions and Limitations

1. This exemption is valid only for substitution of the curriculum requirements of §147.21 for the purpose of student participation in the Aerospace Maintenance Competition.
2. Only authorized faculty members of schools whose students participate in the Aerospace Maintenance Competition may determine if student time dedicated to preparing for and participating in the Aerospace Maintenance Competition may be considered creditable to satisfy the requirements of §147.21.
3. Creditable time is limited to maximum of 60 hours per student per year.

The Effect of Our Decision

Our decision extends the termination date of Exemption No. 17262, to March 31, 2021, unless sooner superseded or rescinded.

Sincerely,

/s/

Robert Carty
Acting Deputy Executive Director, Flight Standards Service

UNITED STATES OF AMERICA
DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
WASHINGTON, D.C. 20591

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In the matter of the petition of *
*
VOCATIONAL INDUSTRIAL CLUBS OF *
AMERICA, INC. *
*
for an exemption from Section 147.21 of *
the Federal Aviation Regulations *
*
* * * * *

Regulatory Docket
No. 26349

GRANT OF EXEMPTION

By letter dated September 26, 1990, and facsimile messages dated November 6 and 15, 1990, Ms. Fay E. Gregory, Chairman, Technical Committee, Aviation Maintenance Technology, Vocational Industrial Clubs of America, Inc. (VICA) petitioned the Federal Aviation Administration (FAA) on behalf of all aviation maintenance technician schools that are certificated under the provisions of Part 147 of the Federal Aviation Regulations (FAR) for an exemption from Section 147.21 of the FAR to the extent necessary to allow the students enrolled in such schools to participate in the VICA airframe and powerplant aviation skill competition at both state and national levels without the student and school being in violation of Section 147.21 of the FAR: General Curriculum Requirements.

The petitioner requires relief from the following regulation:

Section 147.21 of the FAR prescribes, in pertinent part, that an aviation technician school must offer at least a total of 1900 curriculum hours (400 general; 750 airframe; and 750 powerplant) for a combined aircraft and powerplant course of instruction. It further prescribes that at least 50 percent of the total curriculum time must be spent in shop and laboratory instruction.

The petitioner supports its request with the following information:

The petitioner states that VICA is a non-profit organization with a 25 year history serving trade, industrial, technical, and health occupation students in the United States.

The petitioner states that business and government are increasingly looking for people with leadership ability, good communications skills, and the ability to solve problems, who can meet and set goals. The petitioner asserts that VICA stresses and promotes all these qualities and more and emphasizes high ethical standards, superior workmanship, and continuing education as one way of keeping in step with a changing world.

The petitioner further states that one of the VICA programs is a skill competition held at local, state, and national levels, wherein industry and educators work together to organize and run the competitions and set the standards for some 38 skill and six leadership contests.

The petitioner declares that the annual U.S. Skill Olympics (USSO) is the national level of competitive activities in which students demonstrate their achievements. Awards are presented to the top three winners in both secondary (high school) and post-secondary (Junior College, Technical Schools) categories for each contest. More than 300,000 square feet of floor space and over 6.5 million dollars in industry support hosts over 3,000 state winners for the event. This entire extravaganza is attended by the general public, as well as industry and government representatives. The Skill Olympics helps stimulate an interest in vocational-technical training. Industry and the public witness first hand the "best of the best" in a healthy competition for the various skills.

The petitioner states that an Aviation Maintenance Technology (AMT) competition became part of the Skill Olympics program in 1987 and that the competition is patterned after the FAA oral and practical examinations covering all the major subject areas in both airframe and powerplant disciplines.

The petitioner asserts that several Part 147 schools and their instructors decline involvement in the Skill Olympics because they are concerned that the time spent by the students preparing and taking part in the competition will have an adverse effect on their instructional time required for aviation technician certification by the FAR's.

The petitioner states that a maximum of 60 hours a year of Part 147 shop-time requirements would be needed per participating student, and that the total number of students that would exercise the full 60 hours during the national competition would not exceed 100.

In order to ensure that an exemption would not be compromised, the petitioner states that VICA representatives will document each student's activity and the time spent at each activity. A report of each student's activity will be

sent to the student's school where the student will be credited for shop-time against the school curriculum. The Part 147 school will then make the final decision on whether or not the student's activity justifies credit toward their curriculum or if make-up time will be required.

The petitioner contends that the public would benefit through the increase in the level of performance among the students participating in the competition, and the increase in the level of competition among the schools themselves. Both would result in an elevated competence level when the student is certificated and employed in the transportation field.

The petitioner further contends that a level of safety equivalent to that level provided by the exempted rule will be maintained or improved because the student, in order to participate more effectively in the VICA/USSO Aviation Maintenance Technology competitions must, through practice and study, improve his/her level of skill, receive additional hours of instructions, and be evaluated by industry representatives in accordance with FAA standards.

Additional documents submitted by the petitioner as supportive information was an outline of the requirements and provisions of the VICA Aviation Maintenance Technology program, a breakdown of the skill descriptions and related award points used as the VICA/USSO judging criteria, and a summary of the scope of the contest that also identifies the maintenance tasks to be accomplished.

A summary of this exemption was published in the Federal Register on November 30, 1990 (55 FR 49749), and no comments were received.

The FAA's analysis/summary is as follows:

The FAA has evaluated the information submitted in support of this petition and believes that the requested exemption would increase public awareness of the knowledge, skills, and abilities required of the certificated aviation maintenance technician. The FAA endorses any activity that publicizes the professionalism and competence of those persons responsible for aviation safety.

The AMT portion of the Skill Olympics program allows aviation maintenance technician students to demonstrate their ability to accomplish over 40 aircraft maintenance-related tasks while being observed by members of industry, government, and the general public. The poise and self-confidence developed by the student as a result of this presentation is an added benefit of participation in this event.

The FAA believes allowing authorized faculty members of the

individual schools to determine if the time the student devoted to the Skill Olympics is creditable toward satisfying the curriculum time requirements of Section 147.21 of the FAR for that student is an acceptable method of assuring that the intent of this section is complied with.

In consideration of the foregoing, I find that a grant of exemption will not have an adverse effect on safety and is in the public interest. Therefore, pursuant to the authority contained in Sections 313(a) and 601(c) of the Federal Aviation Act of 1958, delegated to me by the Administrator (13 CFR 11.53), those Part 147 Aviation Maintenance Technician schools whose students participate in the U.S. Skill Olympics sponsored by the Vocational Industrial Clubs of America, Inc., are granted an exemption from Section 147.21 to the extent necessary to allow authorized faculty members of those schools to determine if the student time dedicated to preparing for and participating in the Skill Olympics, up to a maximum of 60 hours per student per year, may be considered creditable as shop hours in order to satisfy the requirements of this section. This exemption is subject to the following condition and limitation:

This exemption is not valid for any substitution of the curriculum requirements of Section 147.21 other than for the purpose of student participation in the state and national Skill Olympics.

This exemption terminates on April 30, 1992, unless sooner superseded or rescinded.

/s/ Thomas C. Accardi, Acting Director
Flight Standards Service

Issued in Washington, D.C., on April 10, 1991.